

LUCAS VALLEY LAW
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Attorney for Plaintiffs
AMERICAN PRESIDENT LINES, LTD. and
APL CO. Pte., LTD.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

APL CO. Pte., LTD, a corporation, and
AMERICAN PRESIDENT LINES, LTD., a
corporation,

Plaintiffs,

v.

EXPORT INTERNATIONAL, INC., a
corporation,

Defendant.

No. C 12-4459 EMC

**SECOND STIPULATED MOTION TO
EXTEND THE TIME TO RESPOND
TO THE COMPLAINT**

Pursuant to Civil Local Rule 6-2, plaintiffs American President Lines, Ltd. and APL Co. Pte., Ltd. (collectively "APL") and defendant Export International, Inc. ("EI") request an order extending the time for EI to file an appearance in this matter.

One previous time modification regarding EI's appearance deadline has been requested and granted. The parties have concurrently filed a Second Stipulated Request for Order Granting Relief from Case Management Schedule.

This second request to extend EI's appearance deadline is sought to allow APL and EI time to finalize a settlement agreement. The parties have agreed on the amount of a settlement payment from EI to APL. However, a term of the proposed settlement involves APL entering

1 into a shipping contract with EI. An enlargement of the time for the Case Management Schedule
2 will allow the parties to negotiate the terms of that contract and complete the settlement. (*See*
3 Declaration of Mark K. de Langis, filed in support of this Second Stipulated Motion.)

4 IT IS HEREBY STIPULATED by and between plaintiff APL and defendant EI that EI's
5 appearance deadline be extended to February 1, 2013.

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7 DATED: January 17, 2013

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10 By: /s/ Mark K. de Langis

11 Mark K. de Langis
12 Attorneys for Plaintiffs
13 AMERICAN PRESIDENT LINES, LTD.
14 APL Co. Pte., Ltd.

15 DATED: January 17, 2013

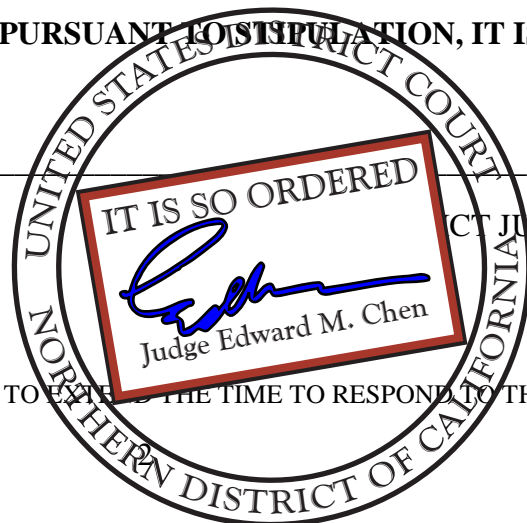
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18 HELTZEL, WILLIAMS, YANDELL, ROTH,
19 SMITH, PETERSEN & LUSH, P.C.

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21 By: /s/ Michael C. Petersen

22 Michael C. Petersen
23 Attorneys for Defendant
24 EXPORT INTERNATIONAL, INC.

25
26 PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: 1/24/13



SECOND STIPULATED MOTION TO EXTEND THE TIME TO RESPOND TO THE COMPLAINT

ATTESTATION PURSUANT TO CIVIL L.R. 5.1

I, Mark K. de Langis, attest that I have on file all holographic signatures corresponding to any signatures indicated by a conformed signature (/s/) within this e-filed document.

/s/ Mark K. de Langis

Mark K. de Langis